

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI**

ANTONIO RODRIGO,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No.
	)	
QUEST DIAGNOSTICS CLINICAL	)	
LABORATORIES, INC.	)	
	)	JURY TRIAL REQUESTED
<b><u>SERVE:</u></b>	)	
CSC-LAWYERS INCORPORATING	)	
SEVICE COMPANY	)	
221 Bolivar Street	)	
Jefferson City, MO 65101	)	
	)	
Defendant.	)	

**COMPLAINT**

COMES NOW, Plaintiff Antonio Rodrigo ("Rodrigo") and for his Complaint against Defendant Quest Diagnostic Clinical Laboratories, Inc. ("Quest") states as follows:

**Parties**

1. Rodrigo is a citizen of the State of Washington.
2. Quest is a foreign corporation doing business in this judicial district.

**Jurisdiction and Venue**

3. Jurisdiction of this Court is based on 28 U.S.C. § 1332, in that there is diversity jurisdiction as the parties are from different states and the amount in controversy exceeds \$75,000.

4. Venue in this Court is proper pursuant to 28 U.S.C. §1391(b), in that Defendant does business in Missouri and Plaintiff resides in the State of Washington, and

further because the events giving rise to the claim in this action first occurred in this district.

**FACTS COMMON TO ALL COUNTS**

1. Plaintiff Rodrigo was employed by Quest as a Medical Lab Scientist at a Quest located at 6651 Chippewa, St. Louis, Missouri 63109 starting August 31, 2014.

2. Rodrigo and Quest entered into a Severance Agreement on July 13, 2018. See Severance Agreement attached as Exhibit A.

3. The Severance Agreement states a severance payment of \$128,400.00 will be made to Rodrigo on or before July 26, 2018.

4. As of the date of this Complaint no payment has been made.

5. The Severance Agreement provides that in the event litigation is instituted between the parties in connection with the Severance Agreement, a judgment shall include a reasonable sum to pay the prevailing party of account of attorneys fees incurred in such litigation.

WHEREFORE, Antonio Rodrigo prays for judgment against Quest Diagnostic Clinical Laboratories, Inc. in the amount of \$128,400.00, plus attorney's fees and Court costs and for such other relief as the Court deems just and proper.

KAPLAN ASSOCIATES, LLC

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